

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IOENGINE, LLC,  
Plaintiff/Counterclaim Defendant,

V.

PAYPAL HOLDINGS, INC.,  
*Defendant/Counterclaim Plaintiff.*

INGENICO INC.,  
*Plaintiff,*

V.

IOENGINE, LLC,  
*Defendant,*

IOENGINE, LLC,  
*Counterclaim Plaintiff,*

V.

INGENICO INC., INGENICO CORP., and  
INGENICO GROUP SA,  
*Counterclaim Defendants.*

[illegible]

C.A. No. 18-452-WCB

# JURY TRIAL DEMANDED

C.A. No. 18-826-WCB

# JURY TRIAL DEMANDED

**Original Version: June 13, 2022**

**Public Version: June 21, 2022**

**DECLARATION OF DEREK J. BRADER IN SUPPORT OF  
IOENGINE, LLC'S BRIEF IN SUPPORT OF ITS MOTION *IN LIMINE* TO PRECLUDE  
RELIANCE ON THE WESTERN DIGITAL BUSINESS RECORDS CERTIFICATION**

I, DEREK J. BRADER, declare as follows:

1. I am an Associate at Dechert LLP, attorneys of record for IOENGINE, LLC (“IOENGINE”) in the above captioned litigations. I am over the age of eighteen and licensed to practice law in Pennsylvania. I have personal knowledge of the facts described herein. If called to testify, I could and would do so competently. I make this declaration in support of IOENGINE’s Brief in Support of Its Motion *in Limine* to Preclude Reliance on the Western Digital Business Records Certification.

2. Attached to this Declaration are true and correct copies of the following exhibits, as cited in IOENGINE's Brief in Support of Its Motion *in Limine* to Preclude Reliance on the Western Digital Business Records Certification, filed contemporaneously herewith:

<b>Exhibit Number</b>	<b>Description</b>
1	Business Record Certification of Western Digital Custodian of Records, dated May 13, 2022
2	Excerpts to the Deposition of Matthew Buchanan dated June 3, 2022
3	Yuval Alpert Work Experience, Buchanan Deposition Exhibit 4
4	Draft Business Record Certification of Western Digital Corporation Custodian of Records
5	Redline between Business Record Certification of Western Digital Custodian of Records, dated May 13, 2022 and Draft Business Record Certification of Western Digital Corporation Custodian of Records

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of June, 2022, in Philadelphia, PA.

/s/ Derek J. Brader

Derek J. Brader